

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LIGHTHOUSE FINANCIAL GROUP,	x	11 Civ. 398 (GBD)
Individually and on Behalf of All Others	:	
Similarly Situated,	:	
	:	ECF Case
Plaintiff,	:	
	:	Oral Argument Requested
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
	:	
	x	

**CHARLES KOCH’S JOINDER IN THE ROYAL BANK OF SCOTLAND GROUP PLC’S
AND THE INDIVIDUAL DEFENDANTS’ MOTIONS TO DISMISS
THE CONSOLIDATED AMENDED COMPLAINT**

Charles Koch hereby joins and incorporates by reference the motions to dismiss and accompanying memoranda of law and declarations in support thereof filed by The Royal Bank of Scotland Group plc (“RBS”) and five Individual Defendants on January 13, 2012. [Dkt. Nos. 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87.]

Although the November 1, 2011 Consolidated Amended Complaint (“CAC”) [Dkt. No. 71] purported to name Charles Koch as a defendant for an alleged violation of Section 11 of the Securities Act of 1933, 15 U.S.C. §§ 77(a)(2) & 77k, at the time RBS and the five Individual Defendants moved to dismiss the CAC, Mr. Koch had not been served with a summons or complaint in this action. Plaintiffs subsequently served Mr. Koch on January 30, 2012. (*See* Affirmation of Service [Dkt. No. 91].)

For the reasons set forth in RBS's and the five Individual Defendants' motions to dismiss and accompanying memoranda of law and declarations in support thereof, the claim against Charles Koch should be dismissed with prejudice.

Dated: February 21, 2012

Respectfully submitted,

/s/ David S. Lesser

David S. Lesser
Robert W. Trenchard
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Telephone: 212-230-8800
Fax: 212-230-8888

Andrea J. Robinson
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: 617-526-6000
Fax: 617-526-5000

Counsel for defendant Charles Koch